

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DAVID BEHRENS,

Plaintiff,

v.

KIMBERLY CLARK CORPORATION,
COTTONELLE, AMAZON.COM INC., STOP &
SHOP KEYPORT, JOHN DOES 1-30 (said names
fictitious, real names unknown) and ABC CORPS.
1-30 (said names fictitious, real names unknown),

Defendants.

Civil Action No.: 3:22-cv-01475

DECLARATION OF JOANNA M. DOHERTY REGARDING ECF 23

I, JoAnna M. Doherty declare as follows:

1. I am over the age of 18 and am competent to testify to the facts stated in this declaration. I am a partner with the law firm of Gordon Rees Scully Mansukhani LLP and counsel of record for Defendants Kimberly-Clark Corporation, Amazon.com Inc. and The Stop & Shop Supermarket Company LLC (improperly plead as non-entity “Stop & Shop Keyport”).

2. I have personal knowledge of the facts set forth in this declaration, and could testify competently to them if called upon to do so.

3. Attached hereto as **Exhibit A** is a copy of an email attaching a copy of the Court’s February 24, 2023 Order denying Defendants’ April 2022 Motions to Dismiss without prejudice (“Order”), sent from me to counsel for Plaintiff David Behrens on February 24, 2023.

4. Attached hereto as **Exhibit B** is a notice confirming that a paper copy of the Order was served on counsel for Plaintiff on February 27, 2023.

5. Attached hereto as **Exhibit C** is a copy of an email attaching copies of

Defendants' Renewed Motions to Dismiss (filed February 27, 2023, *see* ECF 25-27), sent from me to counsel for Plaintiff on February 27, 2023.

6. Pursuant to the Order, paper copies of the Renewed Motions will also be mailed via FedEx to counsel for Plaintiff, and an Affidavit of Service will be submitted via ECF when service is complete.

I declare under penalty of perjury under the laws of the United States of America that the above statements are true and accurate to the best of my knowledge.

Executed this 27th day of February, 2023.

/s/ JoAnna M. Doherty
JoAnna M. Doherty